

UNITED STATES DEPARTMENT OF THE INTERIOR  
OFFICE OF HEARINGS AND APPEALS  
INTERIOR BOARD OF LAND APPEALS

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MAR 27 2017  
BOARD OF LAND APPEALS  
DW

IBLA 2017-XXXX

TGS

2017-135

E14-001

Application for Permit to Conduct  
Geophysical Exploration for Mineral  
Resources on the Outer Continental Shelf

**UNOPPOSED MOTION FOR EXTENSION OF TIME**

Pursuant to 43 C.F.R. § 4.405, TGS and the International Association for Geophysical Contractors (“IAGC”) (“Appellants”) respectfully request an extension of their deadline to file a Statement of Reasons in this appeal. Specifically, Appellants request that the deadline for the filing of their Statement of Reasons be extended to a date that is 30 days after the date upon which the administrative record is lodged by the Bureau of Ocean Energy Management (“BOEM”). The reasons for this extension request are as follows.

Appellants filed this appeal on March 3, 2017. In addition to this appeal, four related appeals were filed on the same date by similarly situated appellants CGG Services (U.S.) Inc. (E14-005), MultiKlient Invest AS (E14-007), WesternGeco, LLC (E14-004), and Spectrum Geo, Inc. (E14-006), all of whom are also represented by Stoel Rives LLP.<sup>1</sup> A sixth appeal was filed on March 6, 2017 by Ion/GX Technology Corporation (“Ion/GX”) (E14-003), who is separately represented. Appellants requested the consolidation of all six appeals, and BOEM indicated in its counsel’s notice of appearance that it does not object to consolidation. If the appeals are consolidated, Appellants and the appellants in the appeals pertaining to permit application numbers E14-005, E14-007, E14-004, and E14-006 would file a single Statement of Reasons. A

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<sup>1</sup> IAGC is a co-appellant in each of these appeals.

copy of Appellants' Notice of Appeal and Motion to Consolidate is attached to this Motion for ease of reference.

Pursuant to 43 C.F.R. § 4.412 and 43 C.F.R. § 4.22(e), Appellants' Statement of Reasons is due to be filed on April 3, 2017. However, BOEM has not yet lodged the administrative record in this appeal or in any of the related five appeals identified above. Counsel for BOEM has indicated that the administrative record in these appeals will not be lodged before Appellants' Statement of Reasons is due under 43 C.F.R. § 4.412.

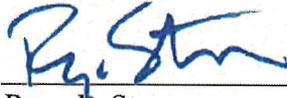
To effectively pursue this appeal, it is critical that Appellants are able to review the administrative record before filing their Statement of Reasons and to support their Statement of Reasons with citations to documents in the administrative record. Appellants will be substantially prejudiced if they are required to file their Statement of Reasons before the administrative record is available because they will have been unable to review and consider the agency documents and correspondence that led to, and supported, BOEM's decision. Accordingly, Appellants respectfully request that the deadline for the filing of their Statement of Reasons be extended to a date that is 30 days after the date upon which the administrative record is lodged by BOEM. *See* 43 C.F.R. § 4.411(d)(3) (requiring BOEM to "promptly" lodge the administrative record).

Counsel for Appellants conferred with counsel for BOEM and counsel for Ion/GX in advance of the filing of this Motion. BOEM's counsel stated that BOEM does not oppose this extension request. Ion/GX's counsel stated that Ion/GX does not oppose this extension request.

DATED: March 24, 2017.

Respectfully submitted,

STOEL RIVES LLP



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**CERTIFICATE OF SERVICE**

I certify that on March 24, 2017 the forgoing Unopposed Motion for Extension of Time  
was sent by email to:

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